

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DAVIS INTERNATIONAL, LLC, HOLDEX, LLC,;
FOSTON MANAGEMENT, LTD, and
OMNI TRUSTHOUSE, LTD,

Plaintiffs,

v.

No. 04-1483-GMS

NEW START GROUP CORP., VENITOM CORP.,;
PAN-AMERICAN CORP., MDM BANK,
URAL-GORNO METALURAGICAL COMPANY,;
EVRAZ HOLDING, MIKHAIL CHERNOI,
OLEG DERIPASKA, ARNOLD KISLIN,
MIKHAIL NEKRICH, and ISKANDER
MAKMUDOV,

Defendants.

PLAINTIFFS' RULE 26(a)(1) INITIAL DISCLOSURES

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT
MAY BE USED TO SUPPORT PLAINTIFFS' CLAIMS:**

Plaintiffs' initial disclosure is made without the benefit of any discovery and prior to Defendants' answers. Plaintiffs reserve the right to amend their disclosures to add additional witnesses.

A. Individuals Associated With Plaintiffs

1. Jalol Khaidarov
Israel
2. Joseph Traum
Israel
3. Aleksey Znadvorov
Ukraine

B. Individuals and Entities Affiliated with Defendants

1. Salim Abdulakhidov
Tashkent, Uzbekistan
2. Mikhail Chernoi
Israel
3. Oleg Deripaska
Russia
4. Joseph Karam
Geneva, Switzerland
5. Arnold Kislin
New York, NY
6. Andrey Kozitsin
Russia
7. Oleg Kozyrev
Russia
8. Mikhail Nekrich
Switzerland and/or Ukraine
9. Iskander Makmudov
Moscow, Russia
10. Officers, directors and beneficial owners of New Start Group Corp.
11. Officers, directors and beneficial owners of Venitom Corp.
12. Officers, directors and beneficial owners of Pan-American Corp.
13. Officers, directors and beneficial owners of Unidale Corp.
14. Officers, directors and beneficial owners of Investland LLC.
15. Officers, directors and beneficial owners of MIC Building Co. L.P.
16. Officers, directors and beneficial owners of MC MIC Building Corp.
17. Officers, directors and beneficial owners of MIC Leasing Co., L.P.
18. Officers, directors and beneficial owners of MC MIC Leasing Corp.

19. Officers, directors and beneficial owners of Around the Clock Corp.
20. Officers, directors and beneficial owners of CMC MIC Holding Company, LLC
21. Officers, directors and beneficial owners of MC Holdings Company, LLC.
22. Officers, directors and beneficial owners of CMC Factory Holding Company, LLC.
23. Officers, directors and beneficial owners of CMC Center Holding Company, LLC.
24. Officers, directors and beneficial owners of CMC Falchi Holding Company, LLC.
25. Officers, directors and beneficial owners of Falchi Building Co., L.P.
26. Officers, directors and beneficial owners of 33-00 Center Building LLC.
27. Officers, directors and beneficial owners of The Factory, L.P.
28. Officers, directors and beneficial owners of MC Factory Corp.

C. Third-Party Witnesses

1. Igor Filgus
Israel
2. Tigran Khourshadov
Istanbul, Turkey
3. Mrs. Felix Lvov
New York
4. Alexander Mordvinov
Russia
5. David Ruben
London, England
6. Simon Ruben
Monaco
7. Vyacheslav Schelkunov

Ukraine

8. Sinisa Vuic
Serbia
9. Mikhail Zhivilo
France
10. Yuri Zhivilo
Switzerland
11. Fed.R.Civ.P. 30(b)(6) witnesses of Kroll International
12. Fed.R.Civ.P. 30(b)(6) witnesses of Banks in which Defendants maintained accounts and wired funds

II. CATEGORIES AND LOCATION OF DOCUMENTS:

All of the below documents are located in Israel and the United States.

1. Documents related to the ownership of GOK shares by plaintiffs.
2. Documents related to sham bankruptcy of GOK.
3. Documents related to fraudulent transfer of GOK shares owned by Davis.
4. Documents related to fraudulent transfer of GOK shares owned by Omni.
5. Documents related to fraudulent transfer of GOK shares owned by Foston.
6. Documents related to fraudulent transfer of GOK shares owned by Holdex
7. Documents related to the false criminal charges against Khaidarov.
8. Documents related to the illegal detention of Traum.
9. Documents related to the consolidation of control over GOK by the conspirators.

III. COMPUTATION OF DAMAGES

Computation of damages will be provided at a later time when jurisdictional issues are resolved.

IV. INSURANCE

Plaintiffs, at this time, are not aware of any insurance agreement under which any persons carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in favor of Plaintiffs or to indemnify or reimburse Defendants for payments to satisfy the judgment.

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Dated: March 8, 2005

CERTIFICATE OF SERVICE

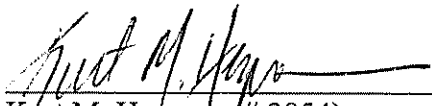
Kurt M. Heyman, Esquire, hereby certifies that on December 23, 2004, copies of the foregoing Plaintiffs' Rule 26(a)(1) Initial Disclosures were served electronically and via hand delivery upon the following counsel of record:

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